

Monthly Progress Report for Corrective Measures Study for Material Disposal Area H, Potential Release Site 54-004, at Technical Area 54 February 2002

Prepared by the Material Disposal Areas Focus Area

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1.0 INTRODUCTION

This progress report summarizes Los Alamos National Laboratory (the Laboratory) activities completed during February 2002 on the corrective measures study (CMS) for Material Disposal Area (MDA) H, Potential Release Site 54-004, at Technical Area 54. The completed activities are described in the CMS plan (Environmental Restoration Project 2001, 70319), which was approved by the New Mexico Environment Department (NMED) Hazardous Waste Bureau on December 7, 2001. These activities and other related operations are summarized below.

2.0 DESCRIPTION OF ACTIVITIES AND CONTACTS

High-Performing Team Activities

There were no MDA High-Performing Team (HPT) meetings during February 2002. On February 26, 2002, all HPT members met with senior management to review the progress of all HPT teams.

Resource Conservation and Recovery Act Facility Investigation Addendum

The Laboratory received analytical data for vadose zone samples collected during December 2001 from boreholes 54-1023, 54-15461, and 54-15462.

CMS Report

The Laboratory incorporated internal and Department of Energy (DOE) EM-50 peer review comments into the CMS report and initiated comment resolution with the peer reviewers.

Public and Stakeholder Involvement

On February 14, 2002, the Laboratory held a makeup meeting for MDA H focus group members who were unable to attend any of the first three meetings. Dolores Garcia of Senator Bingaman's office attended, and John Hopkins and Bruce Poster reviewed the history of MDA H and the minutes of the first three focus group meetings. The fourth focus group meeting was held on February 26, 2002, to select an independent peer reviewer for the MDA H CMS report and to review the status of the CMS report. The group was asked to recommend a first and second choice for an independent peer reviewer. The top three candidates were discussed and members of the group each voted for their top two choices. The focus group will recommend one or more preferred corrective measure alternatives, based on the information discussed in meetings and the Laboratory, DOE, and independent peer review reports.

Contacts

The MDA H CMS contacts are unchanged from the list provided in the first progress report (Environmental Restoration Project 2002, 71479).

3.0 PERCENTAGE OF CMS COMPLETED

The Laboratory estimates that 81% of the CMS has been completed.

4.0 PROBLEMS ENCOUNTERED/ACTIONS TO RECTIFY PROBLEMS

The status of the five problems described in the first two progress reports is unchanged (Environmental Restoration Project 2002, 71479; Environmental Restoration Project 2002, 72612). The problems and actions to rectify them are as follows:

Problem 1. NMED has not yet concurred with the Laboratory's proposed site conceptual model, including assumptions about site geology and hydrogeology.

Problem 2. The target levels (for modeling) have not yet been identified and agreed upon.

Problem 3. DOE and the Environmental Protection Agency base the assessment of risk from radionuclides on dose; NMED bases the assessment of risk from all hazardous constituents in excess of an incremental cancer risk of 10⁻⁵.

Problem 4. The Concerned Citizens for Nuclear Safety and other focus group members have requested that an independent review of the MDA H CMS be conducted.

Problem 5. NMED requested that the Laboratory demonstrate how the proposed corrective measure will meet requirements stated in 40 CFR Part 264, Subparts G and F, "Standards for Owners and Operators of Hazardous Waste Treatment, Storage, and Disposal Facilities." The closure/postclosure care requirements are deemed applicable to MDA H primarily because shaft 9 is considered a *regulated unit*.

Actions to Rectify Problems 1, 2, and 3. The MDA HPT scheduled a series of meetings with modeling and regulatory compliance personnel during March and April 2002 to review the basis for the models, assumptions about site geology and hydrology, contaminant fate and transport, and regulatory issues.

Action to Rectify Problem 4. Focus group members were provided with the resumés of seven individuals to review the MDA H CMS report before the February 26, 2002, focus group meeting. The top three candidates for independent reviewers were Stan Peterson, George Rice, and Bernd Franke, each of whom was discussed during the meeting. Each member of the group voted for two choices; Rice and Franke tied for the most votes.

Action to Rectify Problem 5. The CMS report for MDA H will include a crosswalk, which will identify applicable closure/postclosure care requirements and show how the proposed corrective measure satisfies each requirement. The crosswalk will also reference the specific CMS report section describing how the different aspects of the proposed corrective measure meet the corresponding closure/postclosure care requirements.

5.0 KEY PERSONNEL CHANGES

There have been no changes in key personnel from the list provided in the first progress report (Environmental Restoration Project 2002, 71479).

6.0 PROJECTED WORK FOR MARCH 2002

HPT Proceedings and Decisions

An HPT meeting is scheduled for March 15, 2002, to discuss the draft CMS report.

Resource Conservation and Recovery Act Facility Investigation Report and Addendum

NMED will continue to review the Laboratory's response to the RSI on the MDA H Resource Conservation and Recovery facility investigation (RFI) report, and the Laboratory will continue to assess the preliminary analytical data from volatile organic compound and tritium samples collected from three boreholes at MDA H during December 2002, as requested by NMED (Young 2001, 71537). Work will continue on the RFI addendum scheduled for submittal to NMED during April 2002.

CMS Report

MDA H technical team members will finish incorporating peer review comments into a second draft CMS report; peer reviewers will ensure that the comments were incorporated.

Technical editing of the CMS report will begin during April. The MDA HPT will review the CMS report during meetings. Specifically, Environmental Restoration Project personnel will meet with NMED to discuss the revised site conceptual model and the underlying assumptions.

Work will continue on the preparation of the closure/postclosure care corrective measure crosswalk for inclusion in the report.

Public and Stakeholder Involvement

As requested by the MDA H focus group, a scope of work will be developed for the independent peer review of the CMS report. The focus group agreed to meet on June 4, 2002, (tentatively) at the Cities of Gold from 3:30 to 6:30 p.m. Before the June meeting, the group expects to receive the results of the independent peer review and the December 2001 borehole monitoring data. During the meeting, the group is expected to provide a final recommendation(s) to the Laboratory on the preferred corrective measure alternative.

References

Environmental Restoration Project, March 2001. "Corrective Measures Study Plan for Material Disposal Area H at Technical Area 54," Los Alamos National Laboratory report LA-UR-01-1629, Los Alamos, New Mexico. (Environmental Restoration Project 2001, 70319)

Environmental Restoration Project, February 2002. "Progress Report for Corrective Measures Study for Material Disposal Area H, Potential Release Site 54-004, at Technical Area 54, April through December 2001," Los Alamos National Laboratory report LA-UR-02-0328, Los Alamos, New Mexico. (Environmental Restoration Project 2002, 71479)

Environmental Restoration Project, March 2002. "Monthly Progress Report for Corrective Measures Study for Material Disposal Area H, Potential Release Site 54-004, at Technical Area 54," Los Alamos National Laboratory report LA-UR-02-1345, Los Alamos, New Mexico. (Environmental Restoration Project 2002, 72612)

Young, J., December 3, 2001. "Additional Fieldwork at MDA H, 54-004," New Mexico Department letter HWB-LANL-01-001 to J. Browne and M. Johansen from J. Young, Santa Fe, New Mexico. (Young 2001, 71537)